## MICHIGAN DEPARTMENT OF NATURAL RESOURCES

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US EPA RECORDS CENTER REGION 5

ENV. RESPONSE DIV. DETROIT DIST. OPC.

To:

Mike McDonald

Recreation Division

From:

Anne Couture, Office of Site Reclamation

Environmental Response Division

Subject: BASF Wyandotte Site

After receiving the City of Wyandotte's application for Recreation Division funding, Office of Site Reclamation staff contacted our Livonia district office to determine the nature and extent of the contamination of the BASF South Works site. The summary below is based on information from district staff and from an Environmental Resources Management (ERM) Environmental Assessment completed in January 1991.

The ERM report states that while the current condition and use of the property does not adversely impact human health and the environment, certain restrictions should be imposed on further ERM stated that "the development or other uses of the site. potential current and future risk posed by the site is from direct Measures such as paving or contact with contaminated soil. otherwise sealing the surface with the addition of a soil layer, restricting the ability to disturb the seal or the topsoil, and providing land uses which will limit the amount of time an individual is on the site will lower the risk to within the risk quidelines recommended by EPA." Shallow soil sampling performed by ERM found significantly elevated levels of arsenic, mercury, lead, and other metals, and detectable levels of PCBs and volatile organic compounds. ERM's risk assessment of the site indicates that, without further remedial action, few areas at the BASF South Works would be suitable for any type of recreational use, including the area proposed for recreational development.

Without further remedial action, a boardwalk at or above the surface of the soils could present exposure problems to recreational users and construction workers. Even on an elevated boardwalk, there is no way to ensure that users would stay on the boardwalk at all times. Disturbing the soils at the site for construction of a boardwalk could expose workers directly to the contaminated soils.

An option referred to in the ERM study that could allow the site to meet EPA standards for exposure (and could allow development of the site for recreational or other uses) would be to construct an impermeable clay layer to decrease the likelihood of direct contact BASF Wyandotte Site June 18, 1991 Page 2

with contaminated soils. Specifications for the clay layer would need to be agreed upon by the Department. Any future development of the site would have to be designed so that the integrity of the clay cap would not be affected. After installation of a new cap, we would recommend that another risk assessment be performed to determine whether the site would be suitable for recreational development. If the City of Wyadotte or BASF is interested in exploring this idea, ERD staff would be available to help determine appropriate specifications.

For your information, current cleanup activities at the site will remain active until at least January 6, 2016, thirty years from the date of entry of BASF's consent decree with the Department. Cleanup includes the remedial measures currently underway which prevent the site's groundwater from flowing into the Detroit River.

If you have any questions regarding our analysis of the site, please contact Susan Wenzlick of my staff at 373-0992.

cc: Alan Howard, ERD
Clif Clark, ERD
Charles San Juan, ERD
Susan Wenzlick, ERD

anne P. Courtes